

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS**

**AMERICAN ATHEISTS, INC.;  
BETTY JO FERNAU;  
CATHERINE SHOSHONE;  
ROBERT BARRINGER; and  
KAREN DEMPSEY,**

**PLAINTIFFS**

**v.**

**Case No. 4:19-cv-17-KGB**

**STANLEY JASON RAPERT, in his individual  
and official capacity,**

**DEFENDANT**

**MOTION TO DISMISS AS TO STANLEY JASON RAPERT INDIVIDUALLY**

Defendant Jason Rapert, in his individual capacity, moves to dismiss Plaintiffs' complaint.

For the reasons stated in the accompanying brief, Defendant's motion should be granted.

Respectfully submitted,

/s/ Paul Byrd

Paul Byrd, Ark. Bar No. 85020

Paul Byrd Law Firm, PLLC

415 N. McKinley St. Ste. 210

Little Rock, AR 72205

(501) 420-3050

(501) 420-3128 fax

[paul@paulbyrdlawfirm.com](mailto:paul@paulbyrdlawfirm.com)

*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I, Paul Byrd, hereby certify that on January 14, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall send notification of the filing to any participants.

/s/ Paul Byrd  
Paul Byrd